

DOE has a strong commitment to public involvement. In this plan, these commitments are documented in the Description of Activities, Appendix A, pages 25 through 28.

A direct opportunity for comment on cleanup activities is provided with the publication of proposed cleanup plans. The plans include a comment form that can be mailed or delivered at a meeting and an email address for comments submitted on the Internet.

IV. Public involvement

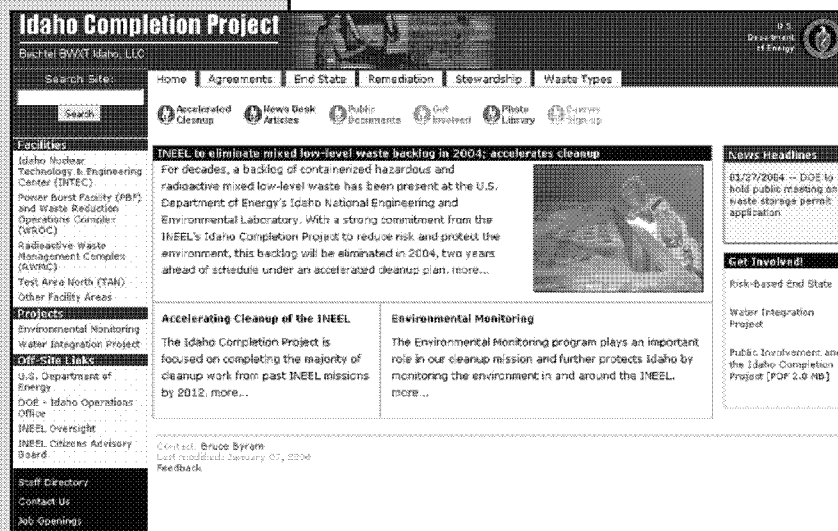
DOE's commitment to involvement

DOE is actively committed to public involvement in all phases of the Superfund process. Besides the legally required public involvement activities, DOE has performed additional activities at the public's request, such as consulting active stakeholders before the proposed plan stage of the CERCLA process, providing tours, and providing copies of documents days before the public comment periods start.

DOE continues to encourage public participation and comments to make public involvement opportunities even more effective and add value to the cleanup decision. Information and involvement activities are described in Appendix A, pages 25 through 28.

DOE is committed to informing and involving the public in the cleanup decision-making process. This Community Relations Plan documents how CERCLA activities have been modified in response to public comment to improve both information and involvement activities. The public involvement in other cleanup actions controlled by other federal or state statutes will be described in the Idaho Completion Project Public Involvement Plan.

Several public comments on information and involvement activities have resulted in improvement in communication between the agencies and citizens. As activities have been added or modified in



*The Idaho Completion Project maintains a website at **cleanup.inel.gov** to provide information to the public. It contains information about cleanup, updates on several cleanup projects, copies of public documents, and more.*

response to public comments, positive feedback from citizens has been received. For example, changes to written materials have increased clarity and reader understanding and provided more related information and answers to common concerns. In response to public concerns, a tracking and referencing system was adopted for use in responsiveness summaries found in records of decision to aid the public in finding responses to their individual comments.

Public meetings have been modified to respond to public concerns. Meeting formats are less formal and presentations less technical. Opportunities for briefings allow the public to interact in person or by phone with agency representatives on specific projects. This allows for the

exchange of both questions and comments.

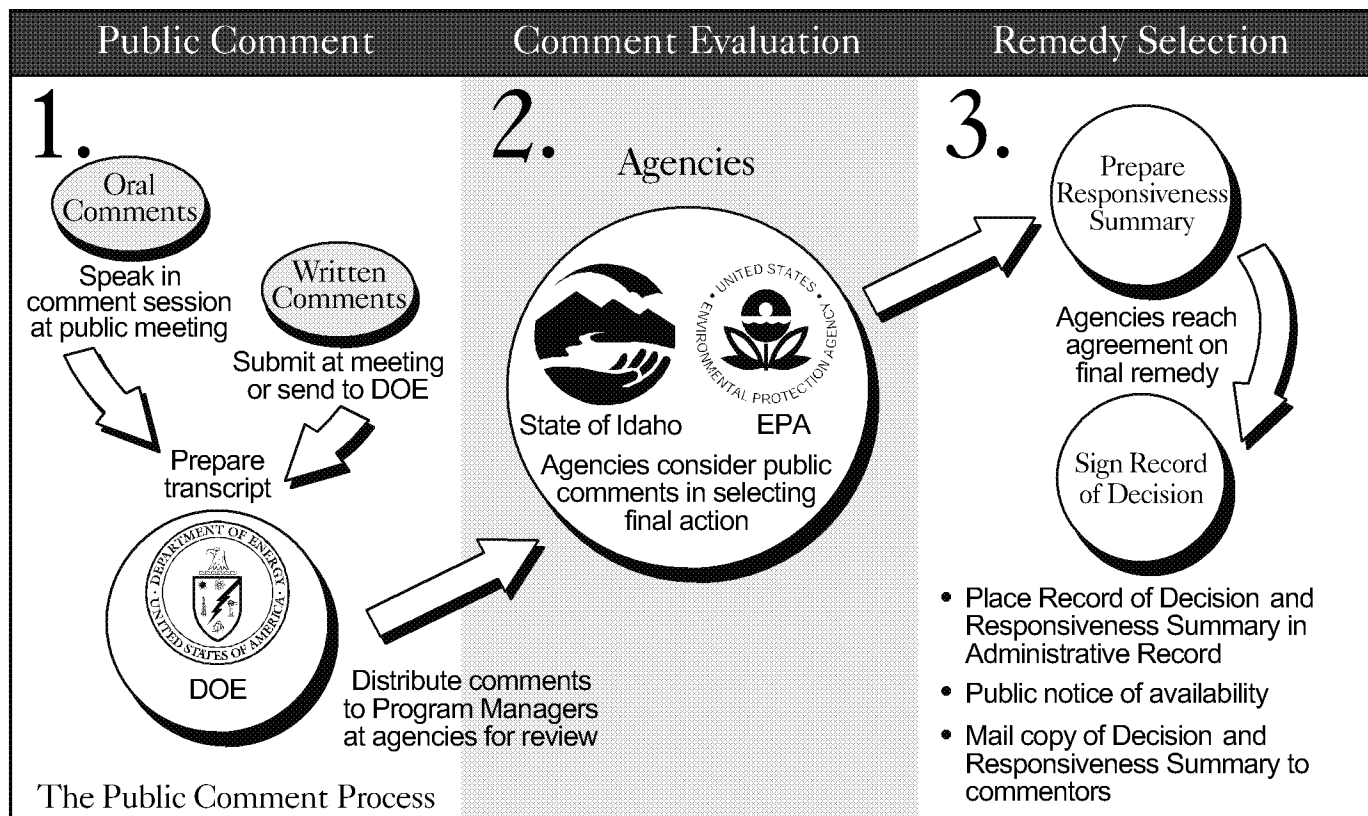
The affected community

DOE defines stakeholders as those individuals, groups, host communities, and other entities in the public and private sectors that are interested in or affected by any of DOE's activities or decisions. The affected community includes citizens directly affected by the INEEL site, other interested citizens or parties, the Shoshone-Bannock Tribes, local and downstream residents, and INEEL employees. Idaho's citizens are affected environmentally and economically by INEEL activities.

The INEEL is one of the state's largest employers and the INEEL's economic benefits are felt statewide, particularly in southeast Idaho. Interest has increased in INEEL projects because of public concern with waste transportation, waste storage and environmental issues.

Finally, members of Idaho's congressional delegation, Idaho's governor, other state officials and members of the state legislature

What happens to public comment?



There are three levels of environmental investigations outlined in the action plan of the FFA/CO:

- 1) Potential release sites at the INEEL will be investigated and evaluated in operable units, where remedial action, if necessary, will be taken to eliminate sources of potential releases to the aquifer or to protect worker and public safety.
- 2) The decisions made for each operable unit will be examined during a comprehensive investigation of each waste area group.
- 3) After the comprehensive investigation at each waste area group is complete, there will be a final comprehensive remedial investigation/feasibility study for the miscellaneous sites and the Snake River Plain Aquifer.

are interested in INEEL programs and environmental activities.

Community profile

Approximately 4,600 people work at the remote INEEL site, while about 2,600 more work at support offices in Idaho Falls. Idaho Falls, located about 30 miles east of the INEEL site, has a population of approximately 50,000 residents and is the largest nearby community. INEEL employees also live in Pocatello, Blackfoot, Rexburg, Arco and other nearby towns. In all, approximately 121,000 people live within a 50-mile radius of the geographic center of the INEEL site, and still more live downstream and are concerned about any issues affecting Idaho's groundwater. Past waste disposal practices at the INEEL have affected portions of the Snake River Plain Aquifer within the INEEL boundary. The aquifer is the primary water source for agriculture, industry and more than 200,000 Idaho residents.

Based on comments received since the early 90s, citizens' concerns and attitudes about the INEEL vary depending on where they live. Many of the citizens and elected officials in the region of Bannock, Bingham, Bonneville, Custer, Jefferson, Butte and Madison counties have been supportive of INEEL activities. Many citizen groups support responsible cleanup and some have called for an end to nuclear reactor testing until the issue of waste disposal is resolved. Others are adamantly opposed to the INEEL being used as a temporary storage site for foreign reactor waste and the nation's commercial reactor waste.

Levels of public involvement

In the past, various levels of public involvement with INEEL activities have been observed. They vary from television and newspaper coverage, to requests for additional information, to participation in briefings or small group discussions. Rough descriptions are listed below:

Aware:

- Keeps up-to-date on events through newspaper, television and radio coverage of INEEL issues
- Requests name be added to mailing list to receive notices concerning upcoming events, public comment periods and specific information releases such as fact sheets

Involved:

- Seeks answers to questions raised during review of written materials

- Calls DOE, EPA or the state of Idaho to get information and asks for answers
- Visits one of the regional INEEL Information Repositories
- Asks for personal phone calls when events approach or when questions arise
- Attends some public meetings
- Knows that agencies invite public comment before making a decision

Actively involved:

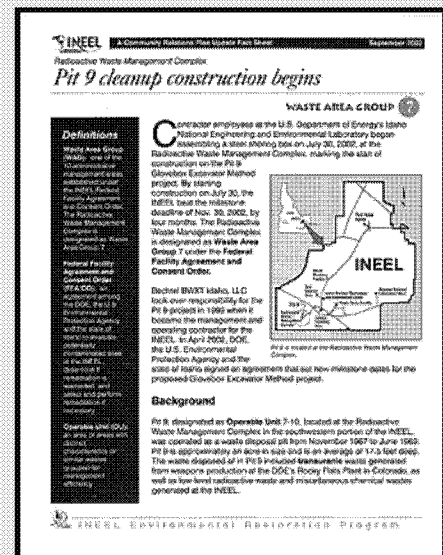
- Desires broader background information on nature and extent of contamination and health risks and is involved in the agencies' key decision-making process for remedial investigations
- Reviews written materials received and submits written or oral comments
- Requests additional information via briefing or small group discussion
- Attends an open house and public meeting to voice opinions concerning agency proposed plans and talks to project managers
- Volunteers to be on an editorial review committee, reviewing and critiquing documents before they are distributed to the public
- Applies to serve on an advisory board or follows board activities
- Attends most or all DOE-sponsored meetings and briefings

Key concerns and values

Since the early 90s key concerns raised by the public remain largely unchanged. They are:

1. Protection of human health and the environment

Citizens remain concerned about protecting human health and the environment in general, and are particularly concerned about protecting the Snake River Plain Aquifer. Most citizens who expressed this concern said DOE should state in each proposed remediation plan whether a potential release site affects the aquifer and what the risks are to INEEL workers and the public. The public also wants to know how the agencies determine risk. Some stakeholders have recently expressed concern about wastes being left in place once remediation is completed.



Fact sheets are periodically released to update stakeholders on the status of cleanup projects and to seek public comment.

Public comments on cleanup projects include the full spectrum—supporting the agencies' proposals, suggesting new alternatives, or complete disagreement. The agencies consider the range of comments in reaching a decision.

Key Community Concerns

- Protection of human health and the environment
- DOE credibility and commitment to public involvement
- State and EPA involvement
- Effectiveness of public involvement activities
- Effectiveness of communication and written material
- Responsiveness

DOE's response: DOE will include a statement in CERCLA proposed plans stating whether the site under investigation affects the aquifer. More emphasis will be placed on explaining the risk this waste may pose to INEEL workers and the public, the risk posed by a cleanup action and the risk of leaving the residual waste in place. Procedures and assumptions for determining risk are outlined in EPA guidance and are often discussed in public meetings, briefings and workshops

2. DOE credibility and commitment to public involvement

A common request by citizens was to be involved earlier in the decision-making process. Members of environmental groups and a civic organization called for the creation of an independent panel to advise DOE on cleanup decisions and issues. Those who supported such a proposal said the panel could enhance the public's comprehension of the cleanup program and involvement in the decision-making process.

DOE's response: DOE responded to citizens' comments, forming the INEEL Citizens Advisory Board, a nonpartisan, broadly representative organization. Fifteen individuals from around the state with diverse backgrounds and interests provide advice to the DOE on environmental restoration, waste management and other INEEL



A radiation control technician checks a tank removed from the ground at the Test Reactor Area for any remaining contamination.

issues. One board member represents the Shoshone-Bannock Tribes. Other members are chosen to represent nine key perspectives: natural resource users, site-related union/workforce, educational community, affected local governments, health professionals, environmental interests, business interests, and the general public. The board develops its own agenda and requests briefings on topics of its choosing. For information about upcoming meetings, check the Citizens Advisory Board web site at <http://www.ida.net/users/cab>. The phone number for the Citizens Advisory Board is listed in Appendix C on page 30.

Earlier public involvement is also achieved by distributing fact sheets to the public. Fact sheets inform citizens about agency discussions and planning assumptions before decisions are made. The public is then able to provide input on a postage-paid comment form during scoping to help the agencies define the work for remedial projects.

3. State and EPA involvement

Some citizens have commented that the state and EPA should be more active in their environmental restoration role. Participants generally regard information from the state and EPA as more reliable than information provided by DOE, and they believe the state is more motivated than federal agencies to protect the environment.

DOE's response: The EPA, the state of Idaho and DOE are partners in the FFA/CO and in all decisions. The visibility of their roles has been emphasized through such practices as including EPA and state comments on documents in the Administrative Record. State and EPA representatives are active participants in meetings, briefings, and workshops, either in person or by teleconference phone calls. Both the state and EPA may also hold meetings and briefings on the remediation program.

The INEEL Oversight Program, an independent state entity, distributes a quarterly newsletter called the *Oversight Monitor*. The state also provides access to INEEL information using a toll-free phone line, (800) 232-INEEL or on the internet at www.oversight.state.id.us.

4. Effectiveness of public involvement activities

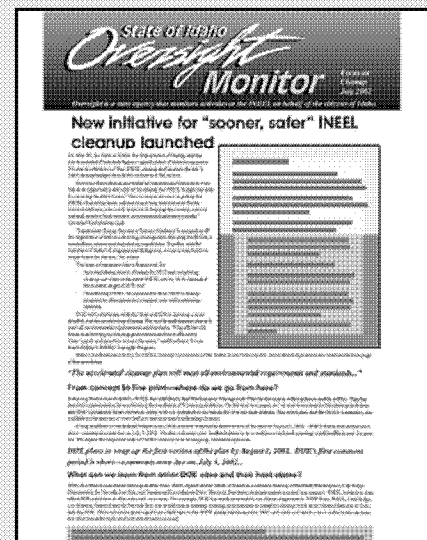
Many workshop respondents have said that DOE needs to get more information to the public in an effort to involve more people. A variety of media have been suggested.

DOE's response: Comments received during small group discussions, open houses, meetings, and workshops form the basis of the

INEEL Oversight Program

The state's INEEL Oversight Program was established by the Idaho legislature in 1990. The program fills an independent oversight role of identifying areas of concern, investigating root causes and recommending actions to improve operations and practices at INEEL. Oversight program staff may choose to take split samples from monitoring wells with DOE or initiate sampling activities on their own to verify results of environmental monitoring.

This program continually monitors water quality of the Snake River Plain Aquifer. For current monitoring information, call (800) 232-INEEL.





community relations activities outlined in this plan. Public participation activities are developed and modified to present different activities and solicit public input to better suit public interest.

The goal of the Community Relations Program is to tailor information and activities to the needs of the public. Appendix A of this plan describes the many ways that DOE provides information to citizens. Citizens can choose the informational sources, opportunities and activities that best fit their level of interest.

5. Effectiveness of communications and written material

The public cited a need to improve written and oral communications with the public. Citizens said they want to see more discussion in proposed plans and fact sheets on risk, remediation alternatives, and final disposal of wastes. Some citizens said they would like DOE to discuss in written form how proposed cleanup actions would benefit them.

DOE's response: Comments received from the public concerning communications, meeting format or written materials (such as proposed plans) are considered early in the development stage. Many of the comments concerning written materials have been incorporated into documents prepared for the public.

6. Responsiveness

Some respondents said DOE needs to do a better job in responsiveness summaries by indicating whether a comment affected the cleanup decision. In addition, citizens have asked that they be given credit when their ideas are used by the agencies.

DOE's response: Public comments are considered by agency representatives prior to finalizing their selection of a remedial action (see chart, "What Happens to Public Comment?" on page 19.) The agencies try not to over-generalize comments so the intent of the comment remains intact. The agencies recognize the importance of each comment and strive to explain the effect they have on cleanup decisions. Comments have contributed to further investigation at a site, incorporating waste treatment suggestions in decision documents and promoting clarification of complex cleanup projects.